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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91218280
Party	Defendant Ibrahim Dabes dba Dabes Egyptian Imports
Correspondence Address	PAUL D BIANCO FLEIT GIBBONS GUTMAN BONGINI & BIANCO PL 21355 E DIXIE HWY, STE 115 MIAMI, FL 33180-1244 UNITED STATES tmmiami@fggbb.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Paul D. Bianco
Filer's e-mail	tmmiami@fggbb.com
Signature	/Paul D. Bianco/
Date	04/07/2016
Attachments	extendmotion.pdf(174704 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Mya Saray, LLC,)	
)	Opposition No. 91218280 (Parent Case)
Plaintiff,)	Cancellation No. 92060249
)	
v.)	
)	
Dabes, Ibrahim DBA)	
Dabes Egyptian Imports,)	
)	
Defendant.)	

**CONSENTED MOTION FOR EXTENSION OF TIME
TO RESPOND TO PLAINTIFF’S MOTION TO SUSPEND**

Registrant and Applicant, Ibrahim Dabes (“Defendant”), by and through undersigned counsel and pursuant to TBMP Sec. 509.01(a), 37 CFR Sec. 2.116(a) and FRCP 6(b)(1), hereby moves the Board for a seven (7) day extension of time to respond to Plaintiff’s Motion to Suspend Proceedings Pending Civil Litigation (“Motion”) filed on March 23, 2016. As the Motion was served by mail, the time for filing a response is twenty (20) days from the date of mailing of the Motion, or April 12, 2016. Accordingly, Defendant, with Plaintiff’s consent, hereby seeks an extension of time until April 19, 2016.

Defendant only became aware of the civil litigation when the Motion was filed and is now considering engaging litigation counsel. Accordingly, it is anticipated that an additional seven (7) day extension will be necessary to respond to the Motion. Moreover, this request for extension is being made with the consent of Mr. Keith Blankenship, counsel for Plaintiff, per his email of April 7, 2016. Please see attached Exhibit A in this regard.

WHEREFORE, Defendant respectfully requests that the Board, pursuant to TBMP Sec. 509.01(a), 37 CFR Sec. 2.116(a) and FRCP 6(b)(1), grant an extension of seven (7) days, that is, until April 19, 2016, for Defendant to file and serve a response to Plaintiff's Motion for Suspension.

Date: April 7, 2016

/ Paul D. Bianco /
Paul D. Bianco

Attorney for Registrant
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CERTIFICATE OF SERVICE

It is hereby certified that a copy of this CONSENTED MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S MOTION TO SUSPEND was served by First Class Mail to M. Keith Blankenship, Esq., Da Vinci's Notebook, LLC, 10302 Bristow Center Dr. #52, Bristow, VA 20136, Attorney for Petitioner, on this 7th day of April 2016.

/Paul D. Bianco/

Paul D. Bianco

FLEIT GIBBONS GUTMAN
BONGINI & BIANCO PL

Paul Bianco

From: M. Keith Blankenship <keith@dnotebook.com>
Sent: Thursday, April 7, 2016 6:06 PM
To: Paul Bianco
Cc: Lourdes Perez; Dinah Fuentes
Subject: Re: Consolidated Proceedings - Opposition No.: 91218280 (parent case) & Cancellation No.: 92060249; Our Ref: 7400-T14-410Opp

Agreed. New due date, April 19th.

Best Regards,

M. Keith Blankenship
Da Vinci's Notebook, LLC
10302 Bristow Center Dr.
No. 52
Bristow, VA 20136
703-581-9562
keith@dnotebook.com

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On Apr 7, 2016, at 6:02 PM, Paul Bianco <pbianco@fggbb.com> wrote:

Keith-

Our opposition to the motion, should we chose to file one, is due April 12th. In light of the ED VA action, our client is considering engaging litigation counsel. Would you agree to a seven (7) day extension, making the opposition due April 19th?

Please let me know.

Thanks
Paul